

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PHILIP E. LANE, M.D., an individual,)
Plaintiff,)
v.)
GREAT LAKES ANESTHESIA, P.C.,) Case No.: 08-C-652
An Indiana Professional Corporation;)
UNIVERSITY ANESTHESIOLOGISTS,)
S.C., an Illinois Professional Corporation;)
and CHICAGO ANESTHESIA)
ASSOCIATES, an Illinois Professional)
Corporation,)
Defendants.)
Judge Darrah
Magistrate Judge Brown

**DEFENDANT GREAT LAKES ANESTHESIA, P.C.'S UNOPPOSED MOTION FOR AN
EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD**

Defendant GREAT LAKES ANESTHESIA, P.C. ("Great Lakes"), an Indiana Professional Corporation, for its Unopposed Motion for an Extension of Time to Answer or Otherwise Plead, states as follows:

1. On January 30, 2008, Plaintiff PHILIP E. LANE, M.D. ("Plaintiff") filed a

complaint against Great Lakes, along with UNIVERSITY ANESTHESIOLOGISTS, S.C., and CHICAGO ANESTHESIA ASSOCIATES, alleging, among other claims, breach of contract against Great Lakes.

2. Great Lakes was served with the Summons and Complaint on May 19, 2008, making its responsive pleading due on June 18, 2008.

3. On June 3, 2008, J. Scott Humphrey and Jeffrey P. Swatzell filed appearances on behalf of the Great Lakes.

4. Great Lakes' counsel needs additional time to review and investigate the claims alleged in Plaintiff's Complaint. Great Lakes, therefore, requests an additional thirty (30) days to answer or otherwise plead.

5. Great Lakes is filing this Motion before the expiration of the period originally prescribed for its answer or other response to be due.

6. This Motion is being filed in good faith and is not for purposes of delay, but rather to allow Great Lakes adequate time to become familiar with the facts of this case and Plaintiff's Complaint.

7. Plaintiffs' counsel has no objection to the relief sought in this Motion, nor will Plaintiff suffer any prejudice as a result of this Motion.

WHEREFORE, Defendant GREAT LAKES ANESTHESIA, P.C. respectfully requests that this Court grant its Unopposed Motion for an Extension of Time to Answer or Otherwise Plead, allowing Great Lakes an additional thirty (30) days to answer or otherwise plead, making such responsive pleading due on July 18, 2008.

Dated: June 3, 2008

Respectfully Submitted,

GREAT LAKES ANESTHESIA, P.C.

By: s/ Jeffrey P. Swatzell
One of Its Attorneys

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CERTIFICATE OF SERVICE

The undersigned attorney certifies that, on June 3, 2008, a copy of the foregoing **Unopposed Motion for an Extension of Time to Answer or Otherwise Plead** was served on the following by the Court's Electronic Filing System:

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s/ Jeffrey P. Swatzell

Jeffrey P. Swatzell